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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. 20-MJ-70968 MAG
Plaintiff,)
v.)
CHEN SONG,)
Defendant.)
)

Defendant Chen Song, by and through her counsel, Edward W. Swanson, and the United States, by and through Assistant United States Attorney Benjamin Kingsley, hereby stipulate and agree as follows:

Defendant was charged by criminal complaint on July 17, 2020 and arrested on that complaint on July 18, 2020. She made her initial appearance in this district on July 20, 2020. On that date, the government moved for detention. On July 21, 2020, defendant was released on conditions, and a preliminary hearing was scheduled for August 10, 2020 at 10:30 a.m. On July 23, 2020, the government moved for reconsideration of the release order. That motion is still pending and scheduled for a hearing on July 31, 2020. Also on July 23, 2020, new defense counsel began representing defendant.

The parties request a continuance of the deadline to submit the bond package to secure Ms. Song's bond with real property pursuant to General Order 55. Ms. Song's family is working to obtain a title report and appraisal of the property that will secure the bond. The parties request that the Court

1 continue the deadline to submit the bond package until August 5, 2020.

2
3 DATED: July 28, 2020

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5
6 /s/
7 BENJAMIN KINGSLEY
8 Assistant United States Attorney

9
10
11 /s/
12 EDWARD SWANSON
13 Counsel for Defendant Chen Song

1 **[PROPOSED] ORDER**

2 For the reasons stated above, the deadline for the bond package to secure Ms. Song's bond is
3 continued until August 5, 2020.

4

5 IT IS SO ORDERED.

6

7 DATED: _____

8 _____
9 HONORABLE SALLIE KIM
10 United States Magistrate Judge